



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 25 2014

CERTIFIED MAIL 7012 1010 0002 0759 6830
RETURN RECEIPT REQUESTED

City of Jackson
Attn.: The Honorable Charles Tillman
Acting Mayor, City Hall
219 South President Street
Jackson, Mississippi 39205

Re: CMOM Training Program Approval
City of Jackson, Mississippi Consent Decree
Case No.: 3:12-cv-790 TSL-JMR

Dear Mayor Tillman:

The U.S. Environmental Protection Agency Region 4 has consulted with the Mississippi Department of Environmental Quality (MDEQ) upon reviewing the CMOM Training Program dated February 28, 2014, pursuant to Section V. of the subject Consent Decree above. The EPA and the MDEQ hereby approve this document pending changes reflective of the following comments.

1. Page 3-4: The last sentence of the second paragraph on this page states, "It is further recommended that all Crew Leaders, ...should be required to obtain a Class II-C Certification." This guidance document should be the tool used to determine this type of requirement. When the document says "recommended that" it "should be required," is it not the City that says whether it is required or not (outside of any state/federal requirements)? If this is a recommended certification, then the City should stipulate that it is "recommended" or "highly recommended." If the City feels that this is a required certification, then the document should clearly state as such (and fully fund the requirement).
2. Page 6-, Section 6.1: "The Public Works Department currently does not have a does not have a staff member dedicated to coordinating training activities." Please delete the second "does not have a." Also, please include in your quarterly reports your efforts to fill the Training Coordinator position.
3. Page 6-1, Section 6.1: Please add to the Duties of the Training Coordinator the following:
 - a. Annual training program review and recommendations for improvement to the Director of Public Works (or delegated official), to include a review of CMOM Training Program guidance documents and training materials. (Or something to this affect so as to ensure the training program effectiveness is being reviewed at least annually and that program documents are being appropriately updated).

The EPA expects that the City of Jackson will revise and resubmit (for the EPA's records) the CMOM Training Program document and certification that the program has been fully implemented no later than 12 months of receipt of this letter, pursuant to Paragraph 32 of the Consent Decree. If you should have any questions regarding the above comments, please contact Mr. Brad Ammons at (404) 562-9769 or via email at ammons.brad@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Maurice L. Horsey, IV". The signature is fluid and cursive, with a large, stylized "M" and "H".

Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
Clean Water Enforcement Branch

cc: Mr. Les Herrington, P.E.
Mississippi Department of Environmental Quality

Mr. Terry Williamson
City of Jackson

Mr. Willie Bell
City of Jackson